

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

RAMON MODESTO,

15-CV-0495 (RA)(KNF)

Plaintiff,

**NOTICE OF MOTION**

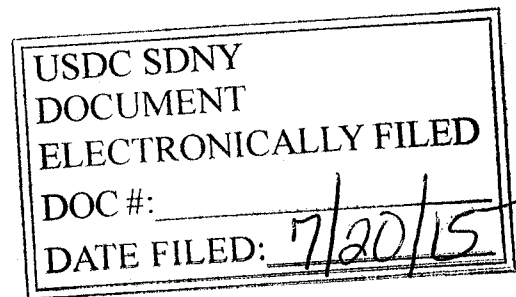
Motion for Extension of Time  
To File Response to  
Motions To Dismiss

-against-

HECTOR FIGUEROA, PRES. OF SEIU 32 BJ  
et. al.

Defendants,

X-----X



**PLEASE TAKE NOTICE** upon the annexed affirmation of RAMON MODESTO affirmed on July 17, 2015 plaintiff will move this Court, before KEVIN NATHANIEL FOX, United States Magistrate Judge for an order pursuant to the Federal Rules on Civil Procedure granting plaintiff's motion for extension of time to file response to various defendants motions to dismiss.

This motion is in response to the courts order directing plaintiff to file a response to the defendants motion to dismiss on or before July 20, 2015 and on or before July 23, 2015 respectively.

**I declare under the penalty of perjury that the foregoing is true and correct.**

Dated: Woodside, New York  
July 17, 2015

*Ramon Modesto*  
Ramon Modesto  
4029 67 St. 2F  
Woodside, New York  
Tel. 718-431-5226

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

RAMON MODESTO,

Plaintiff,

15-CV-0495 (RA) (KNF)

-against-

**AFFIRMATION IN  
SUPPORT OF MOTION**

HECTOR FIGUEROA, PRES. OF SEIU 32 BJ  
et.al.

Defendants,

X-----X

I, RAMON MODESTO, affirm under penalty of perjury that:

1. I, RAMON MODESTO, am the plaintiff in the above-entitled action, and respectfully move this Court to issue an order granting plaintiff's motion for extension of time to file response to defendants motions to dismiss. The Court issued an order for plaintiff to file his response to the defendants motions to dismiss on or before July 20, 2015 and July 23, 2015 respectively.
2. The reason why I am entitled to relief I seek is due to the fact that plaintiff is not only an ordinary layman, a new immigrant unlearned in the law, but also considering that two defendants in this case, namely, PETER ST.JOHN and CHRISTIAN GONZALES, of defendant TRINITY REAL ESTATE have yet to be served copies of the complaint and summons. The court has been duly notified of their present address in a letter earlier sent to the Honorable Court.
3. Plaintiff needs more time to prepare a responsive pleading to the motions to dismiss filed by various defendants.

**WHEREFORE**, I respectfully request that the Court grant this motion, as well as Such other and further relief as may be just and proper.

**I declare under the penalty of perjury that the foregoing is true and correct.**

Dated: July 17, 2015  
Woodside, New York

*Ramon Modesto*  
Ramon Modesto  
4029 67 St., 2 F  
Woodside, New York, 11377  
Tel. No. 718-431-5226